U.S. Department of Justice

United States Attorney
Eastern District of New York

MEB/HDM	*271 Cadman Plaza East*
F. #2016R00695	*Brooklyn, New York 11201*

October 10, 2019

By Email

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> Re: United States v. Jean Boustani et al.
>   Criminal Docket No. 18-681 (WFK)

Dear Counsel:

      Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure consisting of materials with Bates DOJ0003085228 through DOJ0003085423. This disclosure supplements the government's earlier disclosures. The government again requests reciprocal discovery from the defendants.

- DOJ0003085228-DOJ0003085415: ▉▉ material received October 9, 2019.

- DOJ0003085416-DOJ0003085421: ▉▉▉▉▉ material received October 7, 2019 and October 9, 2019.

- DOJ0003085422-DOJ0003085423: ▉▉▉▉▉ material received October 9, 2019 and October 10, 2019. In the interest of time we have not applied individual bates numbers before producing the roughly 3,659 files contained in these materials. We will reproduce this material with individual bates numbers when it is processed.

      Also enclosed please find the government's production of supplemental 18 U.S.C. § 3500 material ("supplemental 3500 material"), and a list of the supplemental 3500 material, which the government has received since its last production of supplemental 3500 material on October 8, 2019. The supplemental 3500 material was sent by email. The government reserves

Defense Counsel
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the right to amend, supplement or alter the enclosed list, and to withdraw or supplement material produced pursuant to 18 U.S.C. § 3500 prior to trial

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney
Eastern District of New York

By: /s/

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